

DIRK KEMPTHORNE
GOVERNOR



GAVIN M. GEE
DIRECTOR

STATE OF IDAHO
DEPARTMENT OF FINANCE
700 W. STATE STREET, 2ND FLOOR
P.O. BOX 83720
BOISE, IDAHO 83720-0031
Website: finance.state.id.us

July 13, 2001

Re: [REDACTED]

Dear Ms. Powell:

This is in response to your letter dated June 18, 2001. You have asked that the Department concur with your opinion that the business plan of [REDACTED] does not involve the offer and sale of a security under the Idaho securities laws.

Our Department has reviewed your original request, dated April 22, 1997 ("Original Request") and our response issued on July 15, 1997. Based on the facts presented in your June 2001 letter, we are willing to recommend to the Director that no enforcement action be taken if the [REDACTED] offers and sells contractual rights ("Residence Agreements") for the use and occupancy of shipboard luxury apartments ("Residences") as described without registration under the Idaho Securities Act.

In reaching this position, we note particularly your representation that the factual change identified in your letter is the only material difference from the facts set forth in your Original Request. Specifically, the Original Request has been modified relating to the provision of rental services on a non-exclusive, unsolicited basis. It is our understanding that the rental services program will operate within the following parameters:

1. The service provider will make no representations with regard to the economic or tax benefits of ownership or rental of residences.
2. The service provider will not advertise its rental services.
3. Availability of rental services will be indicated to potential purchasers only in response to direct questions regarding rental activities.
4. The service provider will not contract with any resident for the provisions of rental services prior to the execution of the resident agreement, nor will any such arrangement be offered in connection with the sale of Residences.
5. The rental program will not involve a pooling arrangement and will not involve any limitations on resident occupancy.

Banks & Savings Banks (208) 332-8005
Credit Unions (208) 332-8003
Securities (208) 332-8004
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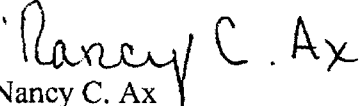
PHONE: (208) 332-8000
FAX: (208) 332-8098
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Securities Fax: (208) 332-8099

Supporting Services (208) 332-8001
Mortgage Companies (208) 332-8002
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EQUAL OPPORTUNITY EMPLOYER

In connection with your representations and the position expressed above, the remaining limitations outlined in the Original Request continue to apply. Please be advised, that this no-action position is based solely on your representation of the facts, and should the facts change or prove to be untrue, this no-action position may no longer be available.

Sincerely,


Nancy C. Ax
Securities Analyst